

SFG Modern Slavery Statement 2026

Prepared pursuant to Section 54 of the UK Modern Slavery Act 2015

Introduction

This Modern Slavery Statement is published by Sustainable Feedstocks Group Limited (“SFG”) for the financial year ending 31 March 2026.

SFG is engaged in the sourcing, aggregation, quality control, logistics, storage and export of waste-derived feedstocks and clean fuels. SFG operates internationally and maintains sustainability and traceability systems appropriate to its activities, including certification under the International Sustainability and Carbon Certification (“ISCC”) scheme.

This statement sets out the steps SFG has taken to identify, assess and mitigate risks of modern slavery, servitude, forced or compulsory labour, child labour and human trafficking within its own operations and supply chains.

This document has been reviewed and approved by the SFG UK Board of Directors and will be published on SFG’s UK website in accordance with applicable requirements.

1. Organisation structure and supply chains

SFG operates across two principal legal entities: Sustainable Feedstocks Group Limited UK in the United Kingdom and Sustainable Feedstock Guangdong Limited its operating subsidiary in China.

SFG’s business activities include the sourcing and aggregation of waste-derived feedstocks, quality control, logistics, storage, inspection and export.

SFG works with a network of selected suppliers and service providers. Its supply chain may also include upstream collectors, sub-suppliers, logistics providers and other service providers which do not necessarily have a direct contractual relationship with SFG.

SFG recognises that modern-slavery-related risks can arise further upstream in supply chains, particularly where collection activities involve smaller businesses, sub-contractors or informal labour arrangements.

SFG therefore seeks to maintain appropriate visibility over the suppliers with whom it actively conducts business and considers labour practices as part of its supplier approval and ongoing due diligence processes.

SFG's own employees in the UK and China are engaged under formal employment arrangements and are subject to applicable local employment and labour laws.

The company has a total of 13 full-time employees and one part-time staff member.

SFG is not aware of any confirmed modern slavery related incidents within its own operations during the reporting period.

2. Policies in relation to slavery and human trafficking

SFG maintains a zero-tolerance position towards modern slavery, forced labour, child labour and human trafficking across its operations.

SFG is committed to acting ethically and with integrity in its business dealings and to working with suppliers and service providers that share these principles.

Relevant controls are incorporated within SFG's existing corporate governance and compliance arrangements, including:

- commercial ethics and compliance requirements;
- supplier approval and due diligence procedures;
- workplace health and safety requirements;
- whistleblowing arrangements;
- Know-Your-Counterparty and counterparty due diligence processes;
- anti-harassment and anti-bullying procedures; and
- employee identity and right-to-work verification processes.

SFG's supplier due diligence processes include consideration of modern slavery, forced labour and child labour risks, together with wider labour and human-rights considerations.

SFG's policies and procedures are reviewed periodically, taking account of applicable legal requirements in the jurisdictions in which SFG operates and developments in recognised sustainability and responsible-sourcing standards.

SFG will continue to develop and formalise its policies and supplier expectations as its business and supply chain develop.

3. Due diligence processes

SFG's due diligence is primarily focused on the suppliers and service providers with whom it has a direct or active commercial relationship. Where appropriate and reasonably practicable, SFG also seeks to understand relevant upstream supply-chain arrangements, particularly where these may present an increased modern-slavery or human-rights risk.

On-site supplier visits form part of SFG's due diligence and relationship-management activities. Such visits are undertaken by SFG personnel where appropriate, taking account of the nature of the supplier relationship, the activities undertaken and the level of identified risk.

These visits enable SFG personnel to gain direct knowledge of the supplier's operations and to consider relevant matters including:

- working conditions;
- the apparent age and status of workers;
- potential indicators of child labour;
- indicators of forced, compulsory or involuntary labour;
- workplace health and safety;
- general employment practices; and
- any circumstances that may indicate heightened human-rights or modern-slavery risk.

Where appropriate, SFG will seek to take proportionate action having regard to the interests of affected workers and the underlying cause of concern. Where serious concerns cannot be satisfactorily remediated SFG reserves the right to suspend or terminate the relevant commercial relationship.

Ultimate oversight rests with the SFG UK Board of Directors, with relevant matters managed through SFG's compliance and operational functions.

SFG also uses external verification mechanisms where appropriate.

In particular, ISCC certification provides an additional independent layer of verification in relation to sustainability and traceability requirements and, where applicable within the relevant certification scope, certain social and labour requirements.

ISCC certification and independent audit therefore provide an additional layer of assurance alongside SFG's own supplier engagement and due diligence activities.

4. Risk assessment and management

SFG considers the potential modern-slavery and human-rights risks associated with its operations and supply chain, taking account of the nature of the activities involved and the level of visibility available. SFG recognises that risks may be greater further upstream, particularly in collection, processing, logistics and handling activities involving smaller businesses, subcontractors or less formal working arrangements.

SFG seeks to manage these risks through a combination of:

- supplier selection and approval;
- Know-Your-Counterparty due diligence;
- direct engagement with suppliers as appropriate;
- on-site visits by SFG personnel where appropriate;
- consideration of child-labour and other labour-related risks;
- review of active supplier relationships, taking account of identified risk; and
- independent certification and verification, including ISCC where applicable.

Where a potential modern-slavery, forced-labour, child-labour or human-trafficking concern is identified, the matter will be reviewed and escalated internally as appropriate.

Depending upon the seriousness of the matter, SFG may undertake additional investigation, require corrective action, suspend commercial activity or terminate the supplier relationship.

5. Key performance indicators to measure effectiveness of steps being taken

SFG will continue to assess the effectiveness of its modern-slavery controls through appropriate management information and operational review.

Indicators SFG may use in assessing the effectiveness of its approach include:

1. supplier-site visits undertaken by SFG personnel where appropriate;
2. The extent to which supplier due diligence and site visits are undertaken taking into account the nature of the supplier relationship and any identified risk;
3. supplier or contractor relationships declined, suspended or terminated as a result of compliance or labour-related concerns;
4. completion of relevant employee compliance and modern-slavery training;

5. concerns identified through due diligence, site visits or internal reporting channels and the actions taken in response; and
6. continued maintenance of relevant independent sustainability certification and verification requirements.

SFG will continue to develop these measures as its compliance framework evolves.

6. Training on modern slavery and trafficking

SFG is introducing modern slavery awareness training for relevant staff to support continuing awareness of modern-slavery risks and SFG's reporting and escalation procedures. Training will be refreshed periodically, taking account of changes in legislation, recognised good practice and SFG's own experience.

Particular emphasis will be placed on employees involved in supplier engagement, procurement, compliance, quality control and operational activities.

Training and guidance will include awareness of:

- modern slavery and human trafficking;
- forced and compulsory labour;
- child labour;
- indicators of potentially inappropriate labour practices;
- matters to consider during supplier-site visits; and
- the procedures for raising and escalating concerns.

Employees who regularly visit suppliers are expected to remain alert to potential indicators of inappropriate labour practices and to report concerns through SFG's internal management and compliance processes.

Training materials and procedures may be reviewed and updated periodically to reflect developments in applicable legislation, recognised standards and SFG's own experience of managing supply-chain risks.

This statement was approved by the Board of Directors of Sustainable Feedstocks Group Limited.



Anthony Michael Brooke Jenkins
Chief Executive Officer
Sustainable Feedstocks Group Limited
24th September 2026